

groups, which is an essential component (C) to be compounded in the photoresist composition used in the claimed process.

The rejection appears to take a position that this deficiency of the Choi primary reference can be remedied by the disclosure in Bantu secondary reference because Bantu teaches that polyvinyl ethers form excellent cross-linking compounds in a CAR containing polyhydroxystyrene-based polymers (7,38-42). Following is a partial reproduction of these particular lines:

"In a further embodiment of the invention, the reactant polymer, such as polyhydroxystyrene or polyvinylcyclohexanol-based polymers may further be modified to incorporate a tertiary butoxycarbonyloxy (t-BOC) or".

It is not at all apparent how this teaching of Bantu can be the basis for the above contention. For example, a "polyvinylcyclohexanol" is not a polyvinyl ether compound which is apparently and erroneously assumed to be a compound having at least two vinyloxy groups in a molecule. Correctly, a "polyvinylcyclohexanol" is a polymer of vinylcyclohexanol of the formula $\text{CH}_2 = \text{CH}-\text{C}_6\text{H}_{10}-\text{OH}$ and is named as an equivalent to a polyhydroxystyrene polymer in Bantu. The polyvinylcyclohexanol, having no vinyl ether groups in the molecule, cannot be a cross-linking agent to a polyhydroxystyrene polymer.

Since the essential contention of the rejection is based on a misunderstanding of the Bantu reference, the 35 U.S.C. 103(a) rejection over Choi + Bantu should be withdrawn.

In Official Action paragraph 9, claims 1-4 have been rejected under 35 U.S.C. 103 as being unpatentable over Takemura et al. (U.S. 6,511,785) in view of Bantu et al. (U.S. 6,072,006) and further in view of Choi (U.S. 6,284,438).

This rejection also respectfully traversed.

The effective date of the Takemura reference is its U.S. filing date of November 13, 2000 which is seven days prior to the priority date of the present application.

However, there is submitted herewith a Rule 131 Declaration which establishes an earlier date of invention than the Takemura effective date.

In this regard, the enclosed Rule 131 Declaration establishes a conception of the invention of the present application prior to the effective date of Takemura coupled with diligence leading to the filing of Applicants Japanese priority application after the effective date of Takemura.

Moreover, the enclosed Rule 131 Declaration constitutes an actual reduction of the present invention prior to the effective date of Takemura reference.

A Verified English translation of Applicants Japanese priority application accompanies. It is apparent that the Japanese priority application supports the present claims in all essential respects.

Accordingly, Takemura et al. is unavailable as prior art and the rejection thereon in view of the secondary references should be withdrawn.

No further issues remaining, allowance of this application is respectfully requested.

If the Examiner has any comments or proposals for expediting prosecution, please contact undersigned at the telephone number below.

Respectfully submitted,

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